

# Exhibit 4

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

JOHN DOES 1-6, <i>et al.</i>	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 25-300 (AJT/LRV)
	)	
U.S. OFFICE OF THE DIRECTOR OF	)	
NATIONAL INTELLIGENCE, <i>et al.</i>	)	
	)	
Defendants.	)	

**DECLARATION OF KEVIN T. CARROLL**

I, KEVIN T. CARROLL, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over eighteen years old and competent to testify. I make this Declaration on personal knowledge, in support of a renewed motion for preliminary injunction. I am admitted to practice law in Virginia, New York and the District of Columbia. Fluet PLLC represents John Does 1-6 and Jane Does 1-13, Plaintiffs in this matter.

2. Plaintiffs, appearing pseudonymously in this matter, provided me with statements in preparation for a meeting with the security-cleared bipartisan staff of the U.S. House of Representatives Permanent Select Committee on Intelligence, statements which contain some identifying personal details. I excerpt these statements in the memo of law supporting this motion, attest that these are accurate excerpts of Plaintiff's statements, and can produce the original statements if needed. I declare under penalty of perjury that the foregoing is true.

/s/ Kevin T. Carroll

Kevin T. Carroll  
Partner, Fluet

Date: March 27, 2025